

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

IN RE:

**Henry Bedford aka Andrei Losev dba Hot  
Rod Motors and Lars Group, Inc.  
Debtor**

CHAPTER 13

CASE NO.: 19-16254-amc

HEARING DATE: 06/18/2024

HEARING TIME: 11:00am

HEARING LOCATION: Courtroom #4

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Shellpoint”) as servicer for US Bank Trust National Association, not in its individual capacity but solely as Owner Trustee for VRMTG Asset Trust (“Movant”) has filed a Motion to Approve the Loan Modification Agreement with respect to real Mortgaged Premises located at 66 Carmelita Dr, Richboro, Pennsylvania 18954.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the modification offered in the motion or if you want the Court to consider your views on the motion, then on or before June 11, 2024, you or your attorney must do **all** of the following:

- (a) file an answer explaining your position at:  
U.S. Bankruptcy Court  
Eastern District of Pennsylvania  
Bankruptcy Clerk of Courts  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the Bankruptcy Clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney:  
Angela C. Pattison, Esquire  
Hill Wallack, LLP  
1415 Route 70 East, Suite 309  
Cherry Hill, NJ 08034  
856-616-8086  
(856)616-8081 (FAX)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Ashely M. Chan on June 18, 2024 at 11:00am, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 204, Courtroom #4, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2830 to find out whether the hearing has been canceled because no one filed an answer.

By: /s/ Angela C. Pattison  
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